

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS; BRIAN
WATSON; STERLING NCP FF, LLC;
MANASSAS NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER; NOVA
WPC LLC; WHITE PEAKS CAPITAL LLC;
VILLANOVA TRUST; CARLETON
NELSON; CASEY KIRSCHNER;
ALLCORE DEVELOPMENT LLC;
FINBRIT HOLDINGS LLC; CHESHIRE
VENTURES LLC; 2010 IRREVOCABLE
TRUST; SIGMA REGENERATIVE
SOLUTIONS LLC; CTBSRM, INC.;
RODNEY ATHERTON; DEMETRIUS VON
LACEY; RENRETS LLC,

Defendants.

CASE NO. 1:20-CV-484-RDA-TCB

800 HOYT LLC,

Intervening Interpleader
Plaintiff / Intervening
Interpleader Counter-
Defendant,

v.

BRIAN WATSON; WDC HOLDINGS, LLC;
BW HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON
DATA SERVICES, INC.,

Interpleader Defendants /
Interpleader Counter-Plaintiffs.

**DECLARATION OF CLAUDIA M. BARRETT IN SUPPORT OF
PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION FOR
COURT-HOSTED SETTLEMENT CONFERENCE OR PRIVATE MEDIATION**

I, Claudia M. Barrett, hereby declare as follows:

1. I am over the age of 18 years. I am an attorney licensed to practice law in the State of California and the District of Columbia. I am an attorney at the law firm of Gibson, Dunn & Crutcher LLP, and counsel of record for Amazon.com, Inc. and Amazon Data Services, Inc. (collectively “Amazon” or “Plaintiffs”). I make this declaration in support of Plaintiffs’ Response to Defendants’ Motion for Court-Hosted Settlement Conference or Private Mediation. Attached to this declaration is the following exhibit:

2. **Exhibit 1** is a true and correct copy of a May 11, 2022 email from Claudia Barrett of Gibson, Dunn & Crutcher (“Gibson Dunn”) to Stanley Garnett of Brownstein Hyatt Farber Schreck (“Brownstein”), copying Patrick Stokes, Elizabeth Papez, Veronica Moyé, Jeffrey Krause, Jason Mendro, and Michael Dziuban of Gibson Dunn and Amanda Houseal of Brownstein, with the subject line “Watson/WDC Settlement Discussion.”

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on July 11, 2022.


Claudia M. Barrett